

FILED
U.S. DISTRICT COURT
DISTRICT OF MARYLAND

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND

UNITED STATES OF AMERICA

v.

MARKUS EUGENE FIELDS, and
TIMOTHY ALLEN MCNEAL,

Defendants

CRIMINAL NO. JFM-16-606

(Conspiracy, 18 U.S.C. §371; Armed
Bank Robbery, 18 U.S.C. §§2113(a), (d),
(e), (g); Brandishing a Firearm During a
Crime of Violence, 18 U.S.C. §924(c);
Felon in Possession of a Firearm,
18 U.S.C. §922(g); Aiding & Abetting, 18
U.S.C. §2; Forfeiture, 18 U.S.C. §924(d))

INDICTMENT

COUNT ONE
(Conspiracy)

The Grand Jury for the District of Maryland charges that:

At all times relevant to this Indictment,

1. Defendants **MARKUS EUGENE FIELDS** ("FIELDS") and **TIMOTHY ALLEN MCNEAL** ("MCNEAL") resided in Baltimore City, Maryland.

2. The Howard County Education Federal Credit Union ("HCE Federal Credit Union"), located at 3458 Ellicott Center Drive, Suite 106, Ellicott City, Maryland, 21043, was a credit union as defined by 18 U.S.C. § 2113(g), and its deposits were insured by the National Credit Union Administration Board. HCE Federal Credit Union maintained a vault on its premises containing money which was in the care, custody, control, and management of HCE Federal Credit Union.

Object of the Conspiracy

3. It was the object of the conspiracy to unlawfully enrich the defendants by robbing a bank in the District of Maryland.

Manner and Means of the Conspiracy

4. At some point prior to August 4, 2016, the exact being unknown to the grand jury, and continuing through August 4, 2016, in the District of Maryland, the defendants **MARKUS EUGENE FIELDS ("FIELDS")** and **TIMOTHY ALLEN MCNEAL ("MCNEAL")** conspired and agreed together to commit offenses against the United States; to wit, bank robbery, armed bank robbery, and bank robbery with forced accompaniment, in violation of Title 18, United States Code Sections 2113(a), (d), and (e), and (g).

5. It was part of the conspiracy that **FIELDS** and **MCNEAL** obtained black ski masks and black gloves to disguise themselves during the robbery.

6. It was further a part of the conspiracy that **FIELDS** and **MCNEAL** obtained zip ties to restrain individuals inside the bank they planned to rob.

7. It was further a part of the conspiracy that **FIELDS** and **MCNEAL** obtained a firearm to use in the bank robbery.

The Charge

8. On or about August 4, 2016, in the District of Maryland, the defendants,
MARKUS EUGENE FIELDS, and
TIMOTHY ALLEN MCNEAL
conspired and agreed together to knowingly and willfully commit offenses against the United States; that is, to take by force, violence, and intimidation from the person and presence of another, and by assaulting any person and putting in jeopardy the life of any person by the use of a dangerous weapon, United States currency belonging to and in the care, custody, control, management, and possession of financial institutions whose deposits were then insured by the National Credit Union Administration Board, in violation of Title 18, United States Code, Section

2113(a), (d), and (g), and that one or more of such persons did an act to effect the object of said conspiracy.

Overt Acts

9. In furtherance of the conspiracy and to achieve its object, the defendants committed and caused to be committed, in the District of Maryland, and elsewhere, at least one of the following over acts, among others, on or about August 4, 2016:

a. **FIELDS** and **MCNEAL** entered the HCE Federal Credit Union, located at 3458 Ellicott Center Drive, Suite 106, Ellicott City, Maryland, 21043. Both defendants wore ski masks to obscure their identity.

b. **MCNEAL** brandished a black rifle at the teller and a customer, and ordered them to the floor.

c. **FIELDS** took cash from the teller drawer while the teller and customer lay on the floor.

d. **MCNEAL** stepped over the customer and walked to the door, which he closed and locked.

e. **MCNEAL** walked down the hall to the office of a supervisor. He ordered the supervisor out of her office and instructed her to open the safe in the bank lobby.

f. **FIELDS** stood watch over the supervisor as she opened the safe in the lobby.

g. **MCNEAL** continued to brandish the firearm and came to the lobby to stand watch over the supervisor as she opened the safe.

h. After the employee opened the safe, **FIELDS** began to remove money from the safe.

- i. One of the defendants ordered an employee to the ground.
- j. **MCNEAL** removed zip ties from the black backpack carried by **FIELDS**.
- k. **FIELDS** used the zip ties to restrain a teller's hands behind her back.
- l. **MCNEAL** used the zip ties to restrain the supervisor's hands behind her back.
- m. **MCNEAL** used the zip ties to restrain the hands of the bank customer behind his back.
- n. **FIELDS** and **MCNEAL** walked down the hallways and climbed out a back window, fleeing the bank.

18 U.S.C. § 371

COUNT TWO
(Armed Bank Robbery)

The Grand Jury for the District of Maryland further charges that:

1. Paragraphs 1, 2 and 9 of Count One of this Indictment are incorporated here.
2. On or about August 4, 2016, in the District of Maryland, the defendants,

**MARKUS EUGENE FIELDS, and
TIMOTHY ALLEN MCNEAL**

did, by force, violence and intimidation, take from the person and presence of the employees of Howard County Education Federal Credit Union ("HCE Federal Credit Union"), located at 3458 Ellicott Center Drive, Suite 106, Ellicott City, Maryland, 21043, a bank, the deposits of which were then insured by the National Credit Union Administration Board, U.S. currency belonging to and being in the care, custody, control, management and possession of said bank, and in committing such offense, did assault and put in jeopardy the life of another person by the use of a dangerous weapon, that is a firearm; and further, in committing such offense, did knowingly force a person to accompany a defendant without the consent of such person in violation of Title 18, United States Code, Section 2113(e).

18 U.S.C. § 2113 (a), (d), (e), and (g)
18 U.S.C. § 2

COUNT THREE

(Brandishing a Firearm During a Crime of Violence)

The Grand Jury for the District of Maryland further charges that:

1. Paragraphs 1, 2 and 9 of Count One of this Indictment are incorporated here.
2. On or about August 4, 2016, in the District of Maryland, the defendants,

**MARKUS EUGENE FIELDS, and
TIMOTHY ALLEN MCNEAL**

did aid and abet and knowingly possess and brandish a firearm in furtherance of, and did aid and abet and knowingly use, carry, and brandish said firearm during, and in relation to, a crime of violence for which they may be prosecuted in a court of the United States, that is, Armed Bank Robbery, as alleged in Count Two of this Indictment.

18 U.S.C. § 924(c)

18 U.S.C. § 2

COUNT FOUR

(Felon in Possession of a Firearm)

The Grand Jury for the District of Maryland further charges that:

On or about August 4, 2016, in the District of Maryland, the defendants,

**MARKUS EUGENE FIELDS, and
TIMOTHY ALLEN MCNEAL**

having been convicted of a crime punishable by imprisonment for a term exceeding one year, did knowingly possess, and aid and abet the possession of, a firearm, in and affecting interstate commerce.

18 U.S.C. § 922(g)(1)

18 U.S.C. § 2

FORFEITURE

As a result of the offenses set forth in Count Four the defendants,

**MARKUS EUGENE FIELDS, and
TIMOTHY ALLEN MCNEAL**

shall forfeit to the United States the firearm identified in the Indictment and involved in the offenses charged herein.

18 U.S.C. § 924(d)



Rod J. Rosenstein
United States Attorney

SIGNATURE REDACTED

Foreperson

21 DECEMBER 2014

Date